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*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X  
ROTHSCHILDS CONTINUATION HOLDINGS AG, :  
ROTHSCHILD NORTH AMERICA INC., :  
ROTHSCHILD INC., and ROTHSCHILD ASSET :  
MANAGEMENT INC., :

Plaintiffs,

- vs -

JED P. KAPLAN, KAPLAN & CO. SECURITIES  
LLC, and LF ROTHSCHILD, LLC,

Defendants.  
----- X

07 Civ. 6261 (AKH)

**NOTICE OF MOTION  
FOR ORDER GRANTING  
EXPEDITED DISCOVERY  
AND PROPOSED ORDER**

To:

Jed P. Kaplan  
17729 Middlebrook Way  
Boca Raton, Florida 33496

Kaplan & Co. Securities, LLC  
150 East Palmetto Park Road  
Suite 450  
Boca Raton, Florida 33432

LF Rothschild, LLC  
150 East Palmetto Park Road  
Suite 450  
Boca Raton, Florida 33432

PLEASE TAKE NOTICE that upon the Summons and Complaint, the accompanying Declaration of John Carroll, dated July 10, 2007, and exhibits thereto, and the accompanying Plaintiffs' Memorandum of Law In Support of Motions for Preliminary Injunction and Order Granting Expedited Discovery, plaintiffs Rothschilds Continuation Holdings AG, Rothschild North America, Inc., Rothschild, Inc., and Rothschild Asset Management, Inc., by their attorneys DLA Piper US LLP, will move the Court, at the United States Courthouse, 500 Pearl Street, New York, New York, on August 7, 2007, or at such other time and date as the Court may designate, for an order, pursuant to Federal Rules of Civil Procedure 26, 30, and 34, and 28 U.S.C. § 1657(a), granting the attached Proposed Order, which grants expedited discovery and for such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that any opposing affidavits and answering memoranda of law are to be served by you upon the undersigned within four business days after service upon you of these moving papers.

Dated: July 11, 2007

DLA PIPER US LLP

By: 

Andrew L. Deutsch (AD 5782)  
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New York, New York 10020  
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*Attorneys for Plaintiffs*